

EXHIBIT A

STATE OF NEW YORK
SUPREME COURT

COUNTY OF FULTON

JAMES W. MARTIN, Individually and as
Owner of MASTIFF CONTRACTING, LLC,

SUMMONS

Plaintiffs,

-against-

Index No.:

02810

CHRISTOPHER HELLMICH, Individually and as
Counsel for JAMES W. MARTIN, and MASTIFF
CONTRACTING, LLC,
Defendant.

TO THE ABOVE NAMED DEFENDANT:


YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney an Answer to the Complaint in the action within twenty days (20) after the service of this Summons, exclusive of the date of service, or within thirty days after service is complete if this Summons is not personally delivered to you within the State of New York. In the event of your failure to appear in this action, Judgment will be taken against you by default for the relief demanded in the annexed Complaint.

The basis of venue is transitory causes of action and the fact that James W. Martin and Mastiff Contracting, LLC is located in Fulton County, State of New York, and among other reasons.

Defendant resides, upon information of belief, in Orange County, State of California.

NOTICE: The relief sought is as set forth in the annexed Complaint and also that of Partition.

Dated: August 12, 2014


Law Offices of Schur & Rose PLLC
Attorneys for Plaintiffs
2431 State Highway 30, P.O. Box 358
Mayfield, N.Y. 12117
(518) 661-5001

RECEIVED

2014 AUG 12 PM 12:37

FULTON COUNTY
CLERK OF COURT

STATE OF NEW YORK
SUPREME COURT

COUNTY OF FULTON

JAMES W. MARTIN, Individually and as Owner
of MASTIFF CONTRACTING, LLC

Plaintiffs,

VERIFIED COMPLAINT

-against-

Index No.:

CHRISTOPHER HELLMICH, Individually and as
Counsel for JAMES W. MARTIN, and
MASTIFF CONTRACTING, LLC,

Defendants.

The Plaintiffs, James Martin, Individually and as Owner of Mastiff Contracting, LLC, by their attorneys', the Law Offices of Schur & Rose, PLLC, allege as follows:

1. That Plaintiff, Mastiff Contracting, LLC, is a Limited Liability Corporation existing under and by virtue of the laws of the State of New York. It has only ever taken action in Fulton County New York.
2. That the Plaintiff, James W. Martin, lives in the County of Fulton, State of New York at all times hereinafter mention was a citizen of the County of Fulton State of New York.
3. Upon information and belief, Christopher Hellmich is a citizen of the Orange County in the State of California.
4. That at all relevant times, Plaintiffs' principal places of business is consistent of among other things a startup business to bring certain

types of technology, thought up and created by Plaintiff, James W. Martin, into existence to produce green energy.

5. That upon information and belief, Mastiff Contracting, LLC, was organized, or now exists to engage in business of creating, funding, financing clean energy derived from the mechanisms and/or resources of Plaintiff, James W. Martin.
6. That the Defendant, Christopher Hellmich, after certain period of time and after being introduced to Plaintiff, Plaintiff's agents, servants and/or employees including individual Plaintiffs herein, claimed to be the attorney for the corporation.
7. That the Defendant, Christopher Hellmich, also agreed to become a one (1%) percent member of the LLC for services rendered.
8. As a result, Christopher, Hellmich, was obligated to engage in fiduciary acts to protect Plaintiff LLC and James W. Martin and George Holley, Jr.
9. That the Plaintiff, its name, and the discovery of the manner to extract energy from the ground was created by James W. Martin, who became well known in the places that would happen to have interest in this type of business. Since 2009, Plaintiff, LLC, has existed for the purposes set forth herein.
10. That the Defendant, Christopher Hellmich, on behalf of himself and as an alleged derived of Mastiff Contracting, LLC, as a shareholder, brought an arbitration in California, in clear violation of the obligation to bring any dispute resolution in the State of New York.
11. This commencement of an arbitration in California also violates Defendant Hellmich's obligation to Mastiff, and the shareholders of Mastiff, James W. Martin and possibly George Holley, Jr., as

Christopher Hellmich claimed he was their counsel, and many confidential conversations had occurred all to the detriment of the Plaintiffs.

AS AND FOR A FIRST CAUSE OF ACTION

12. Plaintiffs repeats and realleges each allegation as contained between paragraphs 1 through 12.
13. That the Defendant, Christopher Hellmich, has used or has attempted to use the copy right and/or information or knowledge of the process to be marketed created by James W. Martin, to his own benefit, and has made misrepresentations, upon information and belief, and has attempted to sell the product, a portion of Mastiff Contrcating, LLC, and the technology, upon information and belief.

AS AND FOR A SECOND CAUSE OF ACTION

14. Plaintiffs repeats and realleges each and every allegation as contained between paragraphs 1 through 14.
15. That the Court should enter an injunction and order the Defendants and any agents, servant and/or employees of the Defendants to cease and dismiss any action in any court, tribunal or arbitration outside the State of New York.
16. That any such resolution is required to be held in the State of New York and specifically in Fulton County Supreme Court, State of New York.

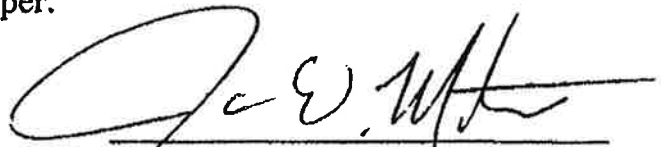
AS AND FOR A THIRD CAUSE OF ACTION

17. Plaintiffs repeat and realleges each and every allegation as contained between paragraphs 1 through 17.

18. That the Defendant Christopher Hellmich has violated his fiduciary obligation to the Plaintiffs herein, Plaintiff, LLC, Plaintiff Martin and Plaintiff Holley.
19. As a result to the above, there has been great damage created and will continue to be created to the Plaintiff, LLC, Plaintiff Martin, and Plaintiff Holley.
20. That the damages to Plaintiffs far exceed the jurisdictional limits of this court.

WHEREFORE, Plaintiffs respectfully request judgment against the Defendants, as set forth above, and as such other further relief as the court deems just and proper.

Dated: August 12, 2014


A handwritten signature in black ink, appearing to read 'J. W. Martin', written over a horizontal line.

James W. Martin, Individually and as
Owner of Plaintiff Mastiff
Contracting, LLC

VERIFICATION

State of New York }
 }ss:
County of Fulton }

On this 12th day of August, 2014, before me, the undersigned, a Notary Public in and for the State, personally appeared, James W. Martin, personally known to me or proved to me on the basis of satisfactory evidence to be the attorney of the individuals whose name are subscribed to the within instrument and acknowledged to me that he executed same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the Instrument.



Notary Pubic

TRACY L. ALDI
Notary Public, State of New York
Qualified in Fulton County
No. 01AL6162983
Commission Expires March 19, 2015